

The State of Michigan is the leader in establishing a statewide public safety communications system. The Michigan Department of State Police (MSP) is currently finalizing full implementation of statewide radio coverage of Michigan's Public Safety Communications System (MPSCS). MPSCS is also in the process of a significant upgrade of system features across the state.

At present, nearly 9000 users are active on the system, representing a broad cross-section of over 170 federal, state, and local public safety and government agencies. This system represents an investment of over \$200 million by the citizens of Michigan. MPSCS also represents part of Michigan's overall homeland security strategy.

Public safety officers and first responders depend on reliable on-demand radio communication. MPSCS communication is increasingly compromised by cellular interference. Neither MSP nor any other public safety agency should expect our officers to daily place their lives at risk without the support of effective and reliable radio communications.

MPSCS staff resources are increasingly diverted to dealing with the impact of the Commercial Special Mobile Radio systems (CSMR's) and "A" band cellular operations on MPSCS's ability to provide reliable radio communication for our field forces and our users' field forces. Of particular concern to MSP is the digital cellular operation of Nextel as an increasing stream of communication problem reports relate specifically to operations of the Nextel system. For example, in the Detroit area alone, Nextel operates over 40 (forty) sites. MSP simply does not have the engineering resources to triage each individual interference problem, then negotiate with Nextel and other carriers in an individualized basis.

The changes proposed in Dockets 02-55 and 02-2202 have far-reaching impact on MPSCS. Of utmost concern to MSP are the elimination of interference to the MPSCS radio system and the attendant cost of any frequency relocation. It is with that perspective that MSP offers the following comments regarding the "Consensus Plan."

MPSCS operates in the NPSPAC channels (821-824/866-869 MHz). The Consensus Plan proposes to move the public safety users in the NPSPAC channels to a new range. Unfortunately, the Consensus Plan offers no prescribed timeline for this move. The NPSPAC band move, according to the Consensus Plan, comes only after all others except Nextel have cleared the proposed new frequency ranges. Then public safety agency systems, like MPSCS, share the new range with Nextel for an undetermined period before Nextel's operations are entirely relocated. It is not clear how this would be alleviate any of the current problems. Quite the contrary, during the period MPSCS and Nextel share the new range, MPSCS will likely experience even more interference since frequency proximity with Nextel is a significant contributor to current interference problems. Again, there is no anticipated time line given for the relocations, nor any indication of what steps would be available to speed up the relocation process.

The Consensus Plan specifies that many frequencies must be cleared prior to relocation of the NPSPAC band users. Thus, current NPSPAC band users are among the last designated to move. NPSPAC band users should be the first designated to move. In particular, by placing NPSPAC